

August 8, 2003

SEED Public Charter School  
Mr. Josh Edelman  
4300 C Street, SE  
Washington, DC 20019

Dear Mr. Edelman:

We want to thank you and your staff for the effort made to gather the necessary information to complete the nutritional analysis of your school menu. The purpose of this School Meal Initiative (SMI) review is to measure the progress you have made in providing healthy meals that meet the USDA nutrition goals for the School Breakfast and National School Lunch Programs (7 CFR 210.10).

The SMI review includes an on-site visit for a meal review and collection of menu documentation; checking for compliance with the meal pattern; checking for completeness of production records; and a detailed computerized nutrient analysis of the meals you served during the week of May 12-16, 2003 based on the documentation provided.

During the site visit on May 28, 2003, the reviewer for the State Education Office was there during the lunch meal. Through observations and discussion with the representative from the catering company, DC Central Kitchen, who was serving the meals, the reviewer noted the following:

- ♦ No counts were being taken of students taking meals.
- ♦ There was no control of portion size taken by the students as they served themselves.
- ♦ No production record was maintained for the day's menu.

The supporting documentation for the review-week menu was given to the State Education Office representative during the on-site visit. Enclosed were a menu, delivery tickets, some recipes and some nutrition facts labels. During preparation for the menu analysis, the nutrition consultant determined that a meaningful analysis could not be completed due to:

- ♦ Numerous missing nutrition facts labels
- ♦ Lack of accurate production records
- ♦ Delivery tickets utilized in place of production records for the week of review lack detail and result in the following:

- In some instances there is no way to verify from the deliver ticket what food items were served that day, and how much was served. For example – a delivery ticket may show cases of cereal delivered, but there is no way to verify how much was served that day, and how much was kept for use on another day.
- The delivery ticket does not specify some food items that were sent on a given day. For example – on the lunch delivery ticket it has a line item *1 ea-1/2 c. fruit/fruit mix*. Written next to it is “250 servings” and “2 cases”, but no indication of what type of fruit and in what form (fresh/canned) it was in.

The nutrition consultant contacted DC Central Kitchen and spoke with the caterer, who did attempt to clarify food delivered to your school. However, it was speculation as to what items were sent and how much was actually to be utilized on a given day's menu.

It is critical that the production record reflect accurate menu information as it has a significant impact on the nutrition analysis. The lack of production records to support what is served, in what portion size, and how many portions are served resulted in the inability to conduct a nutrient analysis of your menu.

In order to measure your menus against the USDA nutrition goals for the School Breakfast and National School Lunch Programs (7 CFR 210.10), you will have a follow-up SMI review and CRE in the fall. You will be notified of the week for the SMI review in advance in order to give you the opportunity to provide all the information and documentation necessary to complete the analysis. In anticipation of this follow-up review, the following corrective action needs to be taken:

Corrective Action Meal Pattern and Nutrition Standards Compliance	
Observations/Finding	Action
Production records not accurately completed with planned production numbers. It is a requirement of the federal regulations (7CFR 210.10 (a)(3)) to maintain production records. The delivery ticket does not provide accurate and detailed information to verify what was delivered, and how much was served to students that menu day.	<ul style="list-style-type: none"> <li>♦ Maintain daily production records with planned number/total portions for each item, including milk and condiment varieties. The planned number reflects an estimate of how much of each menu item is expected to be served – if only 20 students out of 100 are expected to take green beans, then your production sheet should indicate that 20 - 1/2 cup portion of green beans are planned for production and that is the number that should be recorded.</li> </ul>

Production records continued:	<ul style="list-style-type: none"><li>♦ The total number of students expected to be served should be recorded on the daily production sheet.</li><li>♦ Served numbers and leftover numbers need to be recorded at the end of meal service to ensure accuracy.</li><li>♦ These records must show how the meals contribute to the required food components, and how the meals contribute to the nutrition standards.</li><li>♦ Portion sizes should be measurable, and appropriately served. If students self-serve, then items should be pre-portioned. It is your option to allow students to take seconds of food items.</li><li>♦ Any substitutions made to the planned menu must be recorded and accounted for on production records.</li><li>♦ The caterer needs to assist you in maintaining accurate production records.</li></ul>
Nutrition Fact Labels (NFL)	<p>It is required that you provide Nutrition Facts Labels for all processed food items used in the menu that is analyzed for the SMI. This includes items such as sandwich meats and processed chicken patties. It is a good habit to collect all NFL during the year so:</p> <ul style="list-style-type: none"><li>♦ You are aware of the nutrition content of the processed foods offered on your menu.</li><li>♦ You have them available when the SMI review is conducted.</li></ul>
Meal Counts were not being taken. It is a federal regulation (7CFR210.9 (b) (8) & (9) to take accurate counts of reimbursable meals for claiming purposes.	<p>Student meal counts at the point of service must be taken during each meal. These counts are of one reimbursable meal per student by category of Free/Reduced/Paid.</p>

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Enclosed you will find two items:

1. A handout on *Tips on Menu Modifications for Healthy School Meals*.
2. A completed sample production record and a blank form if you choose to use this sample.
3. A copy of one of the delivery tickets used in the example stated above.

If you have any questions regarding your SMI review, please contact the State Education Office at 727-6436, or Linda Rider or Nicole Carmichael at CN Resource, 1-888-546-3273.

Sincerely,

Dr. Cynthia Bell  
State Director

cc: Crystal Faison